

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

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**CHMURA ECONOMICS &  
ANALYTICS, LLC,**

**Plaintiff,**

**v.**

**RICHARD LOMBARDO,**

**Defendant.**

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**Case No. 3:19-cv-00813**

**Judge Robert E. Payne**

**MOTION TO ADMIT *PRO HAC VICE***

COMES NOW Thomas J. Powell, Esq., a member of the Bar of the Commonwealth of Virginia, counsel for Defendant Richard Lombardo, and moves this Court for an Order authorizing Christine Marie Cooper, Esq. (the "Admittee") to appear *pro hac vice* in this case and any related proceedings, and in support of this motion, Thomas J. Powell states as follows:

1. Thomas J. Powell is a member in good standing of the Bar of the Commonwealth of Virginia and the Eastern District Court of Virginia. His Virginia State Bar Number is 27604. He will accompany and be associated with Ms. Cooper throughout this matter.

2. The Admittee is a member in good standing of the State Bar of Ohio, and is admitted to practice before the United States District Courts for the Northern District of Ohio, Southern District of Ohio, Eastern District of Michigan, Northern District of Indiana, and Southern District of Indiana.

3. The Admittee is employed at Koehler Fitzgerald LLC, and her business address is 1111 Superior Avenue East, Suite 2500, Cleveland, Ohio 44114.

4. The Admittee has not been the subject of disciplinary action or been denied admission to the state or federal court of Ohio, or any other state or federal courts.

5. The Admittee has completed an Application to Qualify as a Foreign Attorney under Local Rule 83.1(D), a copy of which is attached as Exhibit A.

6. A proposed Order granting this Motion has been submitted to the Court with this Motion.

WHEREFORE Thomas J. Powell prays that this Court grant his Motion to permit the Admittee Christine Marie Cooper, Esq. to represent the Plaintiff *pro hac vice* in this case and for other further relief as this Court deems just and proper.

Dated: November 24, 2019

Respectfully submitted,

/s/ Thomas J. Powell

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*Attorney for Defendant Richard Lombardo*

**CERTIFICATE OF SERVICE**

The undersigned certifies that a copy of the foregoing has been served on this 24<sup>th</sup> day of November 2019, via the Court's electronic filing system upon the following:

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/s/ Thomas J. Powell  
Thomas J. Powell